

EXHIBIT 1

Eugene Renna

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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: Master File No. 1:00-1898
IN RE: METHYL TERTIARY :
: MDL No. 1358 (SAS)
BUTYL ETHER ("MTBE") :
: M21-88
PRODUCTS LIABILITY LITIGATION :
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This Document Relates To: :
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All Cases :
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VIDEOTAPED DEPOSITION OF EUGENE RENNA
April 23, 2008

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1 THE WITNESS: Okay, Will.

2 BY MR. WALSH:

3 Q. Do you recall making any requests for
4 assessment of minimum investment scenarios in August
5 of 1991?

6 A. No.

7 Q. All right. What was the -- what -- how to
8 do this -- was there a reason for examining or would
9 there have been a reason for examining minimum
10 investment scenarios?

11 MR. BONGIORNO: Objection.

12 You can answer.

13 THE WITNESS: The reason would be that we
14 did -- as you now, I think, are aware, we were
15 struggling to supply our requirements, to make
16 oxygenated fuel.

17 BY MR. WALSH:

18 Q. The focus of the memo is on utilization of
19 MTBE. Was there a reason why a use of ethanol as
20 opposed to MTBE as the oxygenate was not a
21 calculation for a minimum investment scenario?

22 A. I mean, I have to take your word for it.
23 This only talks about MTBE investment?

24 Q. Since my read of it has been incorrect in
25 the past, I will let you -- if you see it differently,

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1 I would be happy to be corrected.

2 A. I'm not sure we would have even known what
3 we were doing, trying to do stand-alone ethanol
4 plants. I can't answer you. If it's not in here,
5 why not?

6 Refineries we knew -- some refineries,
7 like Beaumont, could be modified to produce MTBE. I
8 think we were pretty clear that MTBE was going to be
9 the oxygenate of choice in most areas, because of
10 what we saw as acquisition issues with ethanol.

11 But why we didn't do an analysis about
12 building our own ethanol plant, which I believe is
13 your question, I don't know.

14 Q. That's where I was going. Did Mobil
15 in 1990, 1991, contemplate the construction of its
16 own ethanol-producing facilities or a joint
17 venture with other companies to develop an ethanol
18 facility?

19 A. Ethanol? I don't recall, honestly.

20 Q. At a similar time was Mobil examining a
21 joint venture with a Saudi Arabian company for the
22 construction of a world-scale unit in Saudi Arabia?

23 A. At or around that time.

24 Q. Was it?

25 A. Yes, we were.

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1 Q. You nodded your head.

2 A. Yeah. I'm sorry.

3 Q. That's all right.

4 Was also Mobil Chemical looking at
5 investments in -- or specifically was Mobil Chemical
6 looking at an investment with the Saudis in
7 constructing a plant in Saudi Arabia?

8 A. I think that they were the ones -- that's
9 one and the same. The Chemical was leading the
10 investigation with the Saudis.

11 Q. And that was a proposal that eventually
12 went to the Executive Committee and was approved?

13 A. You know, I was trying to remember --
14 remember the outcome as to how it got progressed. I
15 honestly don't recall. I'm sure it's in the record.

16 Q. At the time, was Mobil contemplating
17 constructing a world-scale unit at Beaumont?

18 A. A world-scale unit?

19 Q. A larger MTBE manufacturing facility at
20 Beaumont?

21 A. I can only answer you, I wouldn't be
22 surprised.

23 You're still talking about this time
24 period of '91, right?

25 Q. Yes.

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1 Milwaukee area?

2 A. I don't know.

3 Q. Turn four pages forward from there. The
4 top of the page is: "USM&R Oxygenate Supply
5 Strategy."

6 A. That's a heading?

7 Q. That's a heading.

8 MR. BONGIORNO: The next page.

9 BY MR. WALSH:

10 Q. And just initially, in the second
11 paragraph, the third sentence there references the
12 need for prospective MTBE suppliers to have a
13 five-year contract?

14 A. Yes.

15 I'm sorry.

16 Q. The next paragraph references a
17 contingency plan for the development of -- or a
18 contingency plan in development.

19 Do you recall the development of that
20 contingency plan?

21 A. No.

22 Q. Were there any technological impediments
23 that you recall to instituting that contingency plan
24 had there not been sufficient supply of MTBE?

25 A. I'm sorry, Will. I'm fascinated with the

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1 paragraph. Please ask the question again. No,
2 seriously.

3 Q. Right. Were there any technological
4 impediments to implementing contingency plan if
5 sufficient supplies of MTBE had not existed, so that
6 Mobil would have used ethanol as its oxygenate in or
7 along the East Coast?

8 A. It doesn't sound like it.

9 Q. Is the only cost that is being identified
10 here the 5 to \$7 million of additional costs for
11 storage?

12 A. I'm in the same position you are, kiddo;
13 all I can do is read it. It looks like it could
14 have been done and the cost was manageable.

15 Q. Do you recall any other costs that were
16 anticipated should the contingency plan need to be
17 implemented?

18 A. No. I don't recall any.

19 Q. Okay. May I borrow that back, just for a
20 minute?

21 A. Yes.

22 Q. I just want to make sure -- I'll make it a
23 little easier for you this way.

24 I, again, apologize for this problem.
25 There is a discussion that starts -- the bottom